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9 Attorneys for WAYMO LLC

10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;  
16 OTTOMOTTO LLC; OTTO TRUCKING  
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE  
CORREDOR IN SUPPORT OF  
PLAINTIFF WAYMO LLC'S  
ADMINISTRATIVE MOTION TO FILE  
UNDER SEAL PORTIONS OF ITS  
NOTICE OF SUBMISSION OF  
INTERROGATORY RESPONSES**

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to  
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,  
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set  
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Waymo’s Administrative Motion to File Under  
7 Seal Portions of Its Notice of Submission of Interrogatory Responses, filed concurrently herewith (the  
8 “Administrative Motion”). The Administrative Motion seeks an order sealing the following materials  
9 filed concurrently herewith:

Document	Portions to Be Filed Under Seal	Designating Party
Appendix A	Entire Document	Waymo; Defendants

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13 3. Specifically, the documents identified in the table above as designated by Waymo  
14 contain or refer to trade secret information, which Waymo seeks to seal.

15 4. The documents identified in the table above contain, reference, and/or describe  
16 Waymo’s trade secrets. The information Waymo seeks to seal includes the confidential design and  
17 functionality of Waymo’s proprietary autonomous vehicle system, including its technical  
18 specifications and/or LiDAR designs, which Waymo maintains as secret. I understand that these trade  
19 secrets are maintained as secret by Waymo (Dkt. 25-47) and that the trade secrets are valuable to  
20 Waymo’s business (Dkt. 25-31). The public disclosure of this information would give Waymo’s  
21 competitors access to descriptions of the functionality or features of Waymo’s autonomous vehicle  
22 system. If such information were made public, I understand that Waymo’s competitive standing  
23 would be significantly harmed.

24 5. Waymo’s request to seal is narrowly tailored to those portions of Appendix A that  
25 merit sealing.

26 6. Waymo only seeks to seal the documents identified in the table above as designated by  
27 Defendants because Waymo believes such information is considered confidential or non-public by  
28 Defendants.

1 I declare under penalty of perjury under the laws of the State of California and the United  
2 States of America that the foregoing is true and correct, and that this declaration was executed in San  
3 Francisco, California, on February 7, 2018.

4 By /s/ Felipe Corredor  
5 Felipe Corredor  
6 Attorneys for WAYMO LLC  
7

8 **SIGNATURE ATTESTATION**

9 Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the  
10 filing of this document has been obtained from Felipe Corredor.

11 /s/ Charles K. Verhoeven  
12 Charles K. Verhoeven  
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